Tax Exempt/Exempt Government Entities Rulings and Agreements Control (TRAC) – Privacy Impact Assessment (PIA)

PIA Approval Date: September 22, 2009

System Overview

TRAC is used to maintain case inventory information for Managers, Tax Law Specialists (TLS), and User Fee Specialists within the Tax Exempt/Government Entities (TE/GE) business unit. The managers, TLSs, and User Fee Specialists are the users of the TRAC application.

TRAC monitors cases by either group or specialists, tracks total time each user spends on each case, processes user fees, and creates reports for management (e.g., determine total number of open cases, how long each case has been opened, which employee is assigned to the case). TRAC can also generate form letters that are standard ruling letters or determination letters to be sent back to the taxpayer.

Systems of Records Notice (SORN):

- Treasury/IRS 50.222 TE/GE Case Management Records
- Treasury/IRS 34.037 IRS Audit Trail and Security Records System

Data in the System

1. Describe the information (data elements and fields) available in the system in the following categories:

ERIM

A. Taxpayer:
- Sponsor name
- Address
- POA Name
- Plan Name
- Plan Number
- Taxpayer Identification Number (TIN)

B. Employee:
- Specialist/Agent's Name
- SEID

C. Audit Trail Information:
- System Level – User Login/Logout time is recorded, including date, time, and associated User ID.
- Application Level – Date and identity of who created and/or last modified data in each table.

D. Other:
- Total Assets
- Sanction Amount
- Related Determination Request Case Number
- Reason Plan Failed Compliance and Total Participants in Plan Submitted.

HQEP

A. Taxpayer:

- Employer/Taxpayer Name
- Plan Number
- Taxpayer Identification Number (TIN)

B. Employee:
- Specialist/Agent's Name
- Group
- Time spend on Case
- Phone Number

C. Audit Trail Information:
- System Level – User Login/Logout time is recorded, including date, time, and associated User ID.
- Application Level – Date and identity of who created and/or last modified data in each table.

D. Other:
- Check Amount
- Bank Name Check Written from
- Person who Wrote the Check
- Refund Amount and Date
- Total Paid
- Waiver of Minimum Funding
- Plan Year Affected
- Amount of Disposition

MAPICS

A. Taxpayer:
- Sponsor Name
- Address
- POA Name
- Plan Number
- Taxpayer Identification Number (TIN)
- Sponsor IRS ID
- POA Name
- POA Phone Number
- Case Name

B. Employee:
- Specialist/TLS Name, Group
- Time Spent on Case
- Grade
- Phone Number

C. Audit Trail Information:
- System Level – User Login/Logout time is recorded, including date, time, and associated User ID.
- Application Level – Date and identity of who created and/or last modified data in each table.

D. Other:
- Check Amount
- Bank Name Check Written from
- Person who Wrote the Check
- Refund Amount and Date
- Total Paid
- Letter Serial Number
- File Folder Number

NOACTS

A. Taxpayer:
- Organization/Taxpayer Name
- Taxpayer Identification Number (TIN)
- Issue or Reason for Submission

B. Employee:
- Specialist/TLS Name
- Group
- Time Spent on Case
- Grade
- Phone Number

C. Audit Trail Information:
- System Level – User Login/Logout time is recorded, including date, time, and associated User ID.
- Application Level – Date and identity of who created and/or last modified data in each table.

D. Other:
- Check Amount
- Bank Name Check Written from
- Person who Wrote the Check
- Refund Amount and Date
- Total Paid

2. Describe/identify which data elements are obtained from files, databases, individuals, or any other sources.

ERIM

A. Taxpayer:
- Sponsor name
- Address

- POA Name
- Plan Name
- Plan Number
- Taxpayer Identification Number (TIN)

B. Employee:
- Specialist/Agent's Name
- SEID

C. Other Federal Agencies: TRAC does not receive information from other federal agencies.

D. State and Local Agencies: TRAC does not receive information from State and Local agencies.

E. Other Third Party Sources: TRAC does not receive information from other Third Party Sources.

HQEP

A. Taxpayer:

- Employer/Taxpayer Name

- Plan Number

- Taxpayer Identification Number (TIN)

B. Employee:
- Specialist/Agent's Name
- Group
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MAPICS

A. Taxpayer:
- Sponsor Name
- Address
- POA Name
- Plan Number
- Taxpayer Identification Number (TIN)
- Sponsor IRS ID

- POA Name
- POA Phone Number
- Case Name

B. Employee:
- Specialist/TLS Name
- Group
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3. Is each data item required for the business purpose of the system? Explain.
Yes. All data items are used by management to support case inventory control, inventory monitoring (i.e., by group and specialist), and processing user fees, as well as reporting functions.

4. How will each data item be verified for accuracy, timeliness, and completeness?
- Accuracy: A manual check is made by a senior tax law specialist when cases are screened for assignment as to the accuracy of the data items by checking the taxpayer's paper submission.

- Timeliness: A manual check is made by a senior tax law specialist when cases are screened for assignment, as to the data items, by checking the paper submission, and the date stamped on the submission by the user fee clerk.
- Completeness: Validity checks are in place on various fields to ensure that certain inputs are maintained (i.e., zip codes must be numeric, etc). Additional checks are in place to ensure that all sponsors are entered into a table before a case can be added.

5. Is there another source for the data? Explain how that source is or is not used.
No. All data is obtained from hardcopy correspondence received from the plan submitter and exempt organization (i.e., taxpayer).

6. Generally, how will data be retrieved by the user?
Data is retrieved by users of the system via queries and reports through the IRS Local Area Network (LAN) via intranet access only using Windows Internet Explorer. Most users can only access data through screens which do not provide ad-hoc query capability; for a small subset of users, they do have an ad-hoc query capability.

7. Is the data retrievable by a personal identifier such as name, SSN, or other unique identifier?
Yes. Data can be retrieved by any field within the database; specifically, EIN, plan name, and case number.

Access to the Data

8. Who will have access to the data in the system (Users, Managers, System Administrators, Developers, Others)?
- User groups define the appropriate level of system access based on job duties. Groups are maintained for the following roles:

- Analysts: Analysts are granted different levels of access to the application and database based upon what functions they need in order to perform their job.

- Tax Examiners/Managers: Tax Examiners are granted different levels of access to the application and database based upon what functions they need in order to perform their job.

- Database Administrators: Database Administrators (DBA) are permitted to modify settings and database configurations within the Oracle database.

- System Administrators: System Administrators (SA) have access to the application (no data) for system administrative purposes only.

- TE/GE Application Administrators: TE/GE Application administrators have access to the application and data in order to provide support to TRAC users.

Contractors do not have access to the TRAC application or TRAC data.

9. How is access to the data by a user determined and by whom?
Data access is granted on a "need to know" basis. The Online 5081 (OL5081) is used to document access requests, modifications, and terminations for all types of users, including System Administrators. When a new user needs access to IRS systems or applications, the

user's manager or designated official, completes an OL5081 requesting access for the new user. OL5081 is an online form, which includes information, such as the name of the system or application, type of access, and the manager's signature approving authorization of access. The completed OL5081 is submitted to the System Administrator, who assigns a user ID, and an initial password.

Before access is granted, the user is required to digitally sign OL5081 acknowledging his/her security responsibilities when using the system. Users are prevented from exceeding their assigned access privileges. Before users can have access to TRAC they must also have their profile entered into the Control Table. This table determines which "menu" they are allowed access to. Menu system limits access to certain screens. Further Informix permissions must be set if they are allowed to add new records, update current ones, or be able to delete any records. These permissions are set by creating GRANT scripts and are implemented by a Database Administrator.

10. Do other IRS systems provide, receive, or share data in the system? If YES, list the system(s) and describe which data is shared.
Yes. The Returns Inventory and Classification System (RICS) receives data from TRAC.

- Voluntary Compliance Submission data sent from EPCRS Research and Inventory Management (ERIM): Employer Name, TIN, Plan Number, Case Submission (work) Code, Case Status Code, Date Entered on System, Case Closed Date, Case Control Date, Case Control Number; and

- Pension Plan requests for waiver of minimum funding data from Headquarters Employee Plans (HQEP): TIN, Case Control Number, a Funded Liability Percentage, Plan Name, Plan Number, Plan Year, Plan Sponsor Name, Amount of Waiver Requested, Case Condition code, Conv From/To, Modification (Y/N), Case Closed Date.

TRAC utilizes the Employee Plans-Exempt Organizations Determination System (EDS) shared database but has its own schema. There is no data shared among any of the EDS database schemas.

11. Have the IRS systems described in Item 10 received an approved Security Certification and Privacy Impact Assessment?
Yes. RICS
- C&A (April 17, 2009)
- PIA (October 31, 2008)

12. Will other agencies provide, receive, or share data in any form with this system?
Yes. TRAC generates reports to provide counts (i.e., number of items processed; number of items completed in certain work categories; number of user fees, etc) within the Tables in the Commissioner's Annual Databook. These reports are then provided to Congress when requested.

Administrative Controls of Data

13. What are the procedures for eliminating the data at the end of the retention period?
Currently, TRAC administrators adhere to the General Record Control Schedule listed in Internal Revenue Manual (IRM) 1.15.2, and maintains TRAC data for over twenty (20) years.

Procedures for eliminating the data at the end of the retention period are being documented within IRM 1.15.24 and are currently in the review process. Once these procedures are finalized, TRAC administrators will follow these new procedures (i.e., shred, destroy, degauss) depending on the appropriate retention process.

14. Will this system use technology in a new way?
Yes. The technology now addresses accessibility for applications that support ADA 508. (e.g., using single keys or hotkeys without the use of a mouse)

15. Will this system be used to identify or locate individuals or groups? If so, describe the business purpose for this capability.
Yes. Individuals are identified through the power of attorney. This information is utilized for case inventory monitoring and occasionally for research purposes.

Organizations are identified by EIN. A user may also retrieve the organization name and organization address. This information is used to support case inventory control, inventory monitoring (i.e., by group and specialist), specialist time management, and processing user fees, as well as reporting functions.

16. Will this system provide the capability to monitor individuals or groups? If yes, describe the business purpose for this capability and the controls established to prevent unauthorized monitoring.
Yes. Monitoring functions extend to case inventory information only to determine what is assigned to each individual and/or associated group. Hours used by individuals or groups are monitored by case and tabulated in reports.

Each screen item can be queried giving results that may allow individual or groups to be monitored, such as how many cases are assigned to a specialist/agent or in the group.

The database items *Created by* and *Date* and *Updated by* and *date* are available in the database but are not displayed on any screen. If data is needed from these fields SQL queries would have to be submitted to a DBA to execute.

17. Can use of the system allow IRS to treat taxpayers, employees, or others, differently?
No. The TRAC application does not perform any function that allows Taxpayers and employees/specialists to be treated differently.

18. Does the system ensure "due process" by allowing affected parties to respond to any negative determination, prior to final action?
Yes. TRAC does not facilitate "due process," but it does not inhibit it either. Additionally, "due process" is dictated by the organization. Taxpayers are provided the Specialist's contact information to discuss negative determinations, or to update incorrect case information.

19. If the system is web-based, does it use persistent cookies or other tracking devices to identify web visitors?
No. Although TRAC is a web-based system, it does not use persistent cookies or other tracking devices to identify web visitors.

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